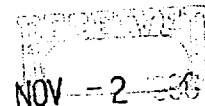




Natural Factors Nutritional Products Inc.

October 19, 1998

9 4 3 1 '98 DEC -1 P 1:58



Food and Drug Administration
Office of Special Nutritionals
Center for Food Safety and Applied Nutrition
200 C St. SW
Washington, DC 20204

Dear Sir or Madam:

This is to provide the required information to comply with our obligation under DSHEA labeling regulations.

Supplement: Panax ginseng Phytosome

Manufacturer, packer: Natural Factors Nutritional Products, Ltd.
3655 Bonneville Pl.
Burnaby, BC
Canada V3N 4S9

Distributor: Natural Factors Nutritional Products, Inc.
1420 80th St. SW, Suite B
Everett, WA 98203

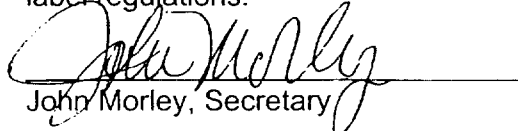
Text of the side panel: Natural Factors Panax Ginseng Phytosome contains a standardized, concentrated extract of Panax Ginseng C.A. Meyer bound to phosphatidylcholine (from lecithin) to significantly enhance bioavailability. Each easy-to-swallow softgel has a naturally balanced ratio of the key Ginsenosides, Rg1 and Rb1, standardized to a minimum of 7%. Many clinical studies indicate that Ginsenosides are responsible for ginseng's worldwide reputation as a superior health, longevity and well being herb. Perhaps most significant is clinical research suggesting its value as a natural adaptogen; promoting resistance to environmental stress.*

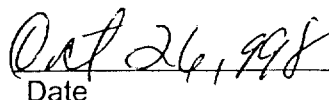
Text on PDP: Promotes Adaptogenic Function and Resistance to Stress.*

Name of dietary ingredient that is the subject of statement: Panax Ginseng

Name of the dietary supplement: Natural Factors

I represent the information presented to be accurate and in compliance with supplement label regulations.


John Morley, Secretary


Date

1420 80th Street S.W., Suite B.
Everett, WA, USA 98203
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